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December 8, 2021

VIA CM/ECF

The Honorable John G. Koeltl
United States District Judge
U.S. District Court
500 Pearl Street
New York, NY 10007-1312

*Application granted.
In addition, the 2/4/22
conference is rescheduled to
2/11/22 at 2:00 P.M.
so ordered. per G/Koeltl
12/9/21 J. U.S.D.C.*

RE: United States v. Beltré et al., 21 Cr. 155 (JGK)

Dear Judge Koeltl:

I represent Noe Villa Rios in the above-captioned matter. Per the schedule set by this Court at the October 28, 2021 status conference, pretrial motions are due December 10, 2021. I respectfully request an adjournment of that deadline to January 7, 2022, because I am engaged in active plea negotiations with the government and may reach a resolution that would avoid the need for motions. I further request that the government's responses be due January 25, and replies be due February 7, and that a conference be scheduled thereafter, at the Court's convenience. This is the first request for an extension of time.

Regardless of the outcome of the above-referenced plea discussions, the government to date has not obtained any information from the cellphones seized in this case. Unless and until such information is obtained and produced, it cannot be determined whether a suppression motion is appropriate. Therefore, I respectfully

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request an opportunity to file such motions at a future time, depending on the circumstances.

Mitchell Elman, counsel to Mr. Beltre joins in this request; Assistant U.S. Attorney Rushmi Bhaskaran has no objection.

Respectfully submitted,

/s/ Jocelyn E. Strauber

cc: Assistant U.S. Attorney Rushmi Bhaskaran
Mitchell Elman, Esq.
(via ECF)